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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:

BED BATH & BEYOND INC., *et al.*,

Debtors.

CASE NO. 23-13359 (VFP)

CHAPTER 11

**OBJECTION OF COLUMBUS PARK CROSSING, LLC, TO NOTICE TO CONTRACT
PARTIES TO POTENTIALLY ASSUMED EXECUTORY CONTRACTS AND
UNEXPIRED LEASES
(Related Docket No.: 714)**

Columbus Park Crossing, LLC (“**Columbus**”), by and through its attorneys, Law Offices of Kenneth L. Baum LLC, by way of objection to the Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Dkt. No. 714] (the “**Cure Notice**”), states as follows:

1. Columbus, as landlord, and Bed Bath & Beyond, Inc., as tenant, are parties to an Agreement of Lease dated May 24, 2001, as amended (the “**Lease**”), for the Debtor’s use of retail premises at a shopping center commonly known as Columbus Park North Shopping Center, located in Columbus, Georgia (the “**Premises**”).

2. The Cure Notice includes, *inter alia*, a potential assumption and assignment of the Lease.¹ The Cure Notice correctly states that there are currently \$0.00 in monetary arrears under the Lease.

3. Columbus specifically reserves its right to object to any other relief sought by the Debtors in connection with the assumption of the Lease, including, but not limited to, any additional amounts coming due under the Lease and any assignee's proposed adequate assurance of future performance (including, but not limited to, such adequate assurance pursuant to Sections 365(b) and 365(f) of the Bankruptcy Code).

WHEREFORE, Columbus respectfully requests that any order in connection with the assumption and assignment of the Lease adhere to the requirements set forth above and such other and further relief as the Court deems just and proper.

Respectfully submitted,

LAW OFFICES OF KENNETH L. BAUM
LLC
Attorneys for Columbus Park Crossing, LLC

By: /s/ Kenneth L. Baum
Kenneth L. Baum

DATED: June 26, 2023

¹ Lease No. 220 in the Cure Notice refers to a lease for property located at "5555 Whittlesey Blvd., Columbia, GA." The actual name of the city where the Premises are located is "Columbus," not "Columbia." The landlord referenced in this lease is AVR CPC Associates, LLC, which is the parent company of Columbus.